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Mary Fallin
Governor

December 2, 2100

Received & Inspected

DEC 19 2011

FCC Mail Room

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

EX PARTE OR LATE FILED

RE: Request by the State of Oklahoma for Waiver of the Commission's Rules to Deploy a 700 MHz Public Safety Interoperable Broadband Network that Can be Integrated into the Public-Private Partnership, PS Docket No. 06-229

Dear Chairman Genachowski:

I am writing to urge the Commission to grant the State of Oklahoma's Expedited Request for Waiver ("Expedited Request") without further delay.

The need for a 700 MHz public safety broadband network (PSBN) to aid first responders is clear due to Oklahoma's history of natural and other disasters and the key industries and critical infrastructure that reside in our state. In addition, Oklahoma's planned PSBN is part of a larger telecommunications infrastructure project that is already underway. Together, these projects promise to create much needed jobs and revenue for the State of Oklahoma. Oklahoma has a plan to move forward, the funding to move forward and the will to move forward. The key hurdle toward making our statewide PSBN a reality is Commission grant of the Expedited Request.

As was described in the Expedited Request, filed well over a year ago, the State of Oklahoma has a dire need for the broadband services that a newly deployed PSBN would supply:

- One of the most atrocious acts of terrorism inflicted on the United States was in Oklahoma City. First responders from all of Oklahoma, the nation and the world responded. The information that could have been provided by a statewide PSBN would have been invaluable.
- The I-40 bridge collapse closed down one of the nation's major traffic arteries. Responders from small rural jurisdictions and the Oklahoma Department of Transportation were the first on the scene. First responder efforts were impaired by the lack of wireless and wired internet access at the rural location.
- The State of Oklahoma is prone to natural disasters. First responders from state and local agencies must respond to damage from tornados, floods, blizzards and wild fires.

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- The State of Oklahoma ranks 3rd in FEMA declared disasters by state and has the highest number of disasters per capita each year.

The protection and security of Oklahoma's key infrastructure, military bases, interstate system and pipeline infrastructure is vital to national, state and local government. Oklahoma's statewide PSBN will provide critical needed situational awareness in the event of natural disasters and in response to incidents or acts of terrorism.

This waiver request also would help address another critical need in the State of Oklahoma: jobs and economic growth. Oklahoma has already commenced construction of a statewide IP backbone network, overseen by the Oklahoma Department of Transportation (ODOT), utilizing point-to-point wireless and IP-MPLS technologies. This statewide network will be leveraged by multiple governmental agencies using multiple applications, such as public safety, transportation, healthcare, education and other governmental services in a secure, reliable manner. A critical component of our overall planned broadband infrastructure is to leverage it for use as backhaul in a statewide PSBN.

The need to move forward with this project is particularly important in this time of economic hardship. The statewide backbone network and LTE broadband networks are estimated to create hundreds of jobs and generate almost \$350 million in revenue through wholesale revenue arrangements, as well as cost savings in just the first five years of operations. Delaying approval of this waiver serves only to delay this economic growth.

Approximately \$150 million has been allocated to the Office of the Chief Information Officer and ODOT to oversee build-out of the statewide LTE network and backbone infrastructure. Although the funding is there *right now*, we obviously cannot break ground on our planned LTE network without Commission authority to operate that network, which in turn represents a delay in the broader benefits the statewide network promises to deliver. With resources stretched thin, no state government can afford to allow allocated funds to remain idle, budgeted but unspent. To ensure the continued availability of this funding for our statewide PSBN, we must act expeditiously.

The State of Oklahoma stands ready to move forward with building a 700 MHz statewide broadband network to improve the safety of the citizens of the State of Oklahoma, provide immediate jobs in the state and lay the foundation for continued economic growth.

For these reasons, I urge you to take swift action and grant Oklahoma's Expedited Request for Waiver.

Respectfully submitted,

A handwritten signature in black ink that reads "Mary Fallin". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Mary Fallin
Governor

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn